

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

CHRISTINE KRUMM, individually and )  
on behalf of all others similarly situated, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 KITTRICH CORPORATION, )  
 )  
 Defendant. )

**DECLARATION OF PRISCILLA SAMBRANO**

I, Priscilla Sambrano, hereby declare as follows in connection with Defendant Kittrich Corporation's ("Kittrich") motion to dismiss:

1. I am over the age of 18 years and am competent to make this Declaration, which is based upon my personal knowledge. I could competently testify to all facts set forth herein if called as a witness in this matter.

2. I am currently employed by Kittrich as a Corporate Paralegal. I have held this position since 2015. In connection with my duties at Kittrich, I am personally familiar with the issues described in this Declaration.

3. Kittrich is a corporation organized under California law. Kittrich's principal place of business is in Pomona, California. Kittrich is not organized under Missouri law and it does not have its principal place of business in Missouri. Indeed, Kittrich does not have any locations in Missouri.

4. On November 16, 2018, Kittrich sent a letter to Yitzchak Kopel of Bursor & Fisher, P.A. regarding Plaintiff Christine Krumm's alleged dissatisfaction with EcoSmart Insect Repellent. A copy of this letter is attached hereto as Exhibit 1-A.

5. The November 16 letter also enclosed a cashier's check in the amount of \$20.00, made out to Ms. Krumm. A copy of the cashier's check is attached hereto as Exhibit 1-B.

6. Mr. Kopel subsequently confirmed receipt of the letter and cashier's check.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 2, 2019

  
\_\_\_\_\_  
Priscilla Sambrano

 COPY

 KITTRICH<sup>®</sup>  
CORPORATION

Sent Via Fed-Ex Overnight Delivery

November 16, 2018

Mr. Yitzchak Kopel  
Burson & Fisher  
888 Seventh Avenue  
New York, NY 10019

Re: Your Letter of November 7, 2018, Regarding Ms. Christine Krumm

Dear Mr. Kopel:

At Kittrich, we value customer satisfaction, so we were sorry to receive your letter stating that your client was not satisfied with her purchase of EcoSmart Insect Repellent. Kittrich stands by the effectiveness of EcoSmart Insect Repellent for its intended use.

Nevertheless, without admitting any alleged liability to Ms. Krumm, and further noting that Kittrich itself does not receive the proceeds of Ms. Krumm's purchase from any retailer, please find enclosed a certified check from Kittrich to Ms. Krumm in the amount of \$20.00. This amount is intended to cover all of Ms. Krumm's costs in purchasing the product from her retailer.

While Kittrich values customer satisfaction, nothing is intended to waive any of Kittrich's rights or remedies at law or in equity, all of which are reserved and none of which are waived.

Sincerely,

Customer Service Department  
Kittrich Corporation

 COPY

Exhibit 1-A

PRINTED ON LINE MARK PAPER. FOLD TO EIGHT TO VIEW. FOR ADDITIONAL SECURITY FEATURES SEE BACK.

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Office AU #	1210(8)	
<b>CASHIER'S CHECK</b>		
Remitter: KITTRICH CORPORATION Operator I.D.: uden0160		November 16, 2018
PAY TO THE ORDER OF ***CHRISTINE KRUMM*** ***RE: KOPEL ECOSMART CLAIM***		**\$20.00**
***Twenty dollars and no cents***		
Payee Address: Memo:		VOID IF OVER US \$ 20.00
WELLS FARGO BANK, N.A. 3289 GRAND AVE CHINO HILLS, CA 91709 FOR INQUIRIES CALL (480) 394-3122		<i>Richard Terry</i> CONTROLLER

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